

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

MANTI'S TRANSPORTATION and  
ALFRED J. MANTI

PLAINTIFF

-against-

PATRICIA KENNER , CT LINES d/b/a/ CAMPUS COACH  
General Electric  
CitiCapital

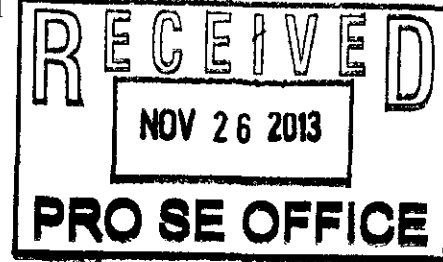
DEFENDANTS

ORIGINAL

COMPLAINT

FEUERSTEIN, J.

Jury Trial Demanded



I. Parties

Plaintiff Manti's Transportation and Alfred J Manti, resides at 34 Hastings St, Staten Island, NY 10305

Defendant Patricia Kenner and Campus Coach resides at 545 5TH Ave Suite 609 10017

Defendant General Electric Capital Corporation C/O CORPORATION SYSTEM  
111 EIGHT AVENUE  
NEW YORK, NEW YORK 10011  
CitiCapital Commercial Corporation Inactive

II. The Jurisdiction of the Court is invoked pursuant to 28 USC 1332

III. Statement of Claim : See Attached

IV. Remedy : Grant me a judgement against CitiCapital and GE for \$50,000,000.00 for hiding evidence before you ruled on dismissing my case.

Grant me a judgement against CT Lines d/b/a Campus Coach and its owner Patricia Kenner of \$10,000,000.00 for stealing 2 buses that were never repossessed but were registered yearly after they were paid \$133,000.00 and used as their own continuously from 11/18/1999 to 8/8/2009 and keeping the sale price.

Have Judge Feuerstein open up my old case and let me take depositions.

11-26-2013  
Date

Alfred J Manti  
Sign Your Name  
646 296-8277  
Your Phone Number

My name is Alfred J. Manti . I am writing to you about a case number 1:2006cv01699 , Manti's Transportation and Alfred J. Manti v. Citicapital Commercial Corporation et al. Because of newly discovered evidence that was hidden in the files of the defendant G E Capital and literally showed up on my doorstep unexpectedly on December 2, 2011 , I am asking that you reconsider your decision in this case.

This previously hidden information was in the defendants' possession the entire time our case was before you. I and my attorneys asked repeatedly for it for 12 years. The company's executives and attorney's swore they did not have it. The evidence was purposely kept from you and from me. If you will take the time to read this letter and review CitiCapital and GE's documents in the order they were submitted to you, I am confident you will reach the same conclusion I have: their defense in my case wasn't based on facts. It wasn't a good-faith effort to address the issues raised in the case. It was a cynical, purposeful ruse by a gigantic powerful corporation designed to deceive the court, hide the truth and deny me a fair chance to make my case to you.

And it worked. Almost. Until now.

Please bear with me. Your Honor. I will be clear and methodical. The evidence is most disturbing.

I want you to know that I am not some disgruntled ex-plaintiff who lost a decision and spent the last several years trying to figure a way to reverse results I didn't like. I never got anything like the day in court that I deserve. The case, which started when I filed papers with Judge Frederick Block ( Exhibit W ) and ended with your decision,( Exhibit V ) has been a difficult and frustrating journey for me and my family and my amazing dedicated attorney's. CitiCapital and GE have been a tenacious and well funded opponents. However now, based upon evidence I have obtained after you dismissed my case, I can prove how these huge companies covered up crimes committed by its employees and made a mockery of the Federal Court system by hiding evidence that was never intended to see the light of day. Given the manner and time these documents were submitted to the Court, and the correspondence which occurred between not only Citicapital and G E but also with Campus Coach's attorney there is zero chance, Your

Honor, that this was done without the full knowledge of their attorneys.  
Zero chance.

The information I have acquired, a long-hidden bus title, came quite by accident. A low-level GE employee, acting upon my request sent it to me via Fed- Ex to my home. ( Exhibit A ) This was after repeated denials by GE executives and attorneys that the documents existed or was in the company's possession. When this was discovered by GE she was soon after terminated from her job and she had to hire a lawyer and recently after two Montana Court decisions specifically mentioning my case before Judge Feuerstein's Court, G E has settled her suit.

Here's what happened: In November of 2011, I was home alone the Sunday before Thanksgiving watching the football Giants on TV and my daughter's computer was in front of me on the coffee table. I was always curious that GE never gave me the titles to the two Campus Coach buses which I purchased November 18,1999, from the corporate owner, Ct Lines. They were the only two titles that we haven't accounted for of the 18 buses we financed. We were told by GE title exec Bobbi Buck that they weren't in GE's possession back in 2006.

I googled GE Capital, not really expecting anything that would be of any use. The computer listed many websites phone numbers and I picked the first one. When I called , this being a Sunday, I only received a list of categories. The fourth one stated that if I want the title division I should call a certain number. I stored the number in my phone. Two days later I pulled the phone number and made the call, not expecting to actually speak with a live person. I was surprised when a young-sounding woman picked up the phone and asked if she could help me. I told her that I needed to clear up some matters. I said I wondered if G E still had possession of the two titles. She asked for the Vin numbers which I didn't have. Luckily, I remembered one of the title Vin numbers because it was only six figures, S15322. The woman said she needed at least 8 numbers and letters to access her system. She asked for my name and address and said, " If I can release it to you, I will. " I hung up and forgot about the whole thing.

Nine days later I received one of the two titles Ct lines signed over to me on November 18,1999, ( Exhibit B ),which neither Associates, CitiCapital, nor GE had ever filed with the NYS Department of Motor Vehicles. Along with

it I received the Oklahoma Lien application. ( Exhibit C ) Larry Shute took the titles as per his instructions on his fax to me dated October 12, 1999. ( Exhibit S )

The front of the lien application accurately recites the security agreement date of 11/18/1999 ( Exhibit C ) but the back of the title which was signed over to me when I paid for the bus on 11/18/1999 with financing from Associates Commercial Corporation strangely lists 8/21/2000 as the date of the lien.( Exhibit F ) Larry Shute was with me in the offices of Campus Coach delivering the check made out to Campus Coach. This title sat in Larry Shute's office in Exton, Pa. for 9 months doing nothing.

This proves that Associates/Citicapital had actual possession of my original certificate of title for the nine months from the date I purchased the bus until the date of my last refinance with Associates and Larry Shute did not go to the NYS DMV as stated in his fax on October 12, 1999 ( Exhibit S ) and never perfected liens for Associates Commercial Corporation. How did he get away with this inside his own company? Can he lend money without actually putting liens on vehicles or does he need the ok from someone above him ?

The importance of the date 8/21/2000 is quite damaging to G E and proves everything I have been saying from my initial filing before Judge Block. This date is the last of my security agreements I had with Associates Commercial Corp. where all of my loans were brought up to date and we were to start fresh. This is also the date on the back of the title I received from the GE title vault in Billings, Montana which should read 11/18/1999. This vehicles papers was sitting in Associates offices collecting dust and the beginning of this nightmare was about to begin. I will include the contract of 8/21/ 2000. ( Exhibit T )

I called my attorney, Paul Hollender. He told me to hurry and call for the other title. I called the same number I had called the previous week and went through the same procedure on the phone, but this time I had the Vin number, 1M89CM8A7BPO36640. The young woman on the phone stated it should take about a week to ten days. After ten days, I called the number again. This time things were dramatically different. I was given a number in Irving, Texas, and was switched to several people within the Legal Department at GE Capital headquarters. I initially talked to a Carla Arriaga

who said, " You're the one causing all these problems." She said, " You wouldn't send that title back to us, would you?" She passed me on to Xavier Wooten. I started to explain the situation to Xavier and how I wanted the other title they were holding and that it was mine.

Out of nowhere, he stated that if I tried to get a duplicate title for the second vehicle, GE would prosecute me to the fullest extent of the law. My reply was, " Great, the title is already duplicated by Campus Coach," I added that I would be happy to send him all the documents. Mr. Wooten said that was impossible but passed me to a Kevin Partin. ( Exhibit D )

I began talking to Kevin Partin, who stated that the title I received previously was a huge mistake. He said it had generated hundreds, thats right , he said hundreds of calls from attorneys in Montana, New York, Philadelphia and Connecticut. Calls, he said, had come to Irving, Texas all about the title I received from the Montana vault in Billings. Clearly, something became exposed that GE Capital wanted to keep closed.

I told Kevin Partin about the efforts I'd been making to receive the other Campus Coach title and asked for his help. He asked me to give him a few days and call back. I waited two days. When I called again, Partin told me his job was at risk just for talking to me. I pressed him further and asked where that order came from. He said his supervisor. I asked to be connected and the in-house attorney Scott Tinkersley came on line - on a speaker phone. I told him my whole story and asked for the other title. He answered: " That's above my pay grade." He gave me his phone number but refused to give his e-mail address.

After hearing that Kevin Partin was risking his job merely talking to me, I knew that the girl whose name was on the FedEx envelope, Nicole Coghill, (Exhibit A) was not going to be employed by G E Capital much longer. I kept calling the offices in Irving, Texas, but never I never mentioned the girl whose name was on the FedEx envelope. I was hoping she would manage to get through this still employed. I kept calling Irving, Texas, still talking to Kevin Partin, who kept complaining that his job was in jeopardy but seemed fascinated with the way this story was developing. I pressed on. Eventually, Kevin Partin was released from employment at GE.

Several weeks had passed, and I tried again to secure the other title GE was

holding, thinking it might slip through the cracks as the first title had.. I said to the woman that answered the phone that I had been trying to get a title and that I was not being successful. This person was not helpful.

I suspected Nicole was no longer employed by GE. I hired a private detective. He came back in a few days with a phone number in Billings, Montana and said he was sure it was the girl in question. He was correct.

I was extremely nervous about calling this girl. What do I say? Would she even talk to me? I called. Nicole Coghill Stamp answered the phone. I said hello, my name is Al Manti. There was a hesitation that seemed to last forever. Finally, she said: "Was I fired for sending you that Oklahoma lien?"

"You were fired for sending the title along with the Oklahoma lien," I told her.

She immediately started crying, saying she did nothing wrong and that she had two small children and that she needed that job. I can't begin to tell you how bad I felt. I felt responsible for her losing her job.

She began to tell me a fascinating story about how, after the title was sent to me, there were meetings with GE's in-house attorney in Billings, who told the entire group that no one was to talk to an Al Manti and that he might even show up in Montana, that he was very creative and to expect anything. The in - house lawyer took possession of the other title from the vault and kept it in his private office. I have recently learned that his name is John VonLangen.

Before visiting Montana I called a labor lawyer in NYC and asked him what would happen to someone who through no fault of her own sent incriminating documents that would make her employer look very bad. His response was that if they decided to fire her they would set scenario where she would be made to look incompetent and fire her for cause. I asked him the time frame and he responded several weeks. He was right on target, what we had envisioned for this poor girl went exactly how this labor lawyer stated.

I asked Nicole if she hired an attorney. She said she had one in mind but it wasn't official yet. His name is Philip McGrady. I asked for his number and



had my attorney call him. He took her case, and I made arrangements to visit Montana. I should mention that I have been in close touch with Assistant US Attorney Peter Schenck, head of the Criminal Division in the Philadelphia office, who has expressed considerable interest in the case and is extremely well-versed on the details. He too contacted Philip McGrady.

When I arrived in Billings, Montana, I first met her attorney, Philip McGrady, sharing with him my trials and tribulations of the past few years and showing him the real reason Nicole Coghill was fired. He seemed interested to learn how GE was concealing these two specific titles. After reading the documents I brought from New York, he said: "Now I know why Nicole Coghill Stamp was fired and it had nothing to do with job performance."

I met Nicole Coghill the following day along with her husband and attorney. I showed her the actual title she sent me, I also showed her a copy of the duplicate title, ( Exhibit D ), that Patricia Kenner applied for from the NYS DMV and matches the Vin # ( 1M89CM8A7BPO36640 ) on the title still being held by GE in their Montana vault. This title was received by Campus Coach after a letter from Patricia Kenner, VP of campus Coach, was submitted to the NYS Department of Motor Vehicles

Nicole Coghill looked at the documents I presented and said very calmly, "You've been Title Skipped." she said.

I asked what that meant. Her answer floored me.

She described exactly what had happened to me. "You were cheated," she said. "The original owners, Campus Coach, were paid for the bus. They kept it, registered it continually and sold it as their own. And you, Al Manti, are left holding the bill."

This happens more often than most people imagine, she said. She said it so calmly the hairs on the back of my neck went up.

Her attorney, Philip McGrady, filed papers for wrongful termination. The US Attorney was even mentioned in her papers to Judge Cebell. Judge Cebell ordered a full trial ( Exhibit P ) which GE then has asked for reconsideration and the case was sent to Judge Strong for arbitration where

Nicole's case was just settled.

Judge Feuerstein, in your decision you state the new evidence I uncovered in the past could have been found out with some due diligence. The significance of the back of this title is why I'm here. ( Exhibit F )

This title with the wrong date of statement on the back ( Exhibit F ) clearly shows that Larry Shute and Associates Commercial never intended for me to have this title. Why would a loan officer, Larry Shute , keep a title in his possession for nine months and not even lien this vehicle ? GE still refuses to release the other title from the same contract. Why? This title sat in the Exton, PA. office till my final contract on August 20 , 2000. That is the date on the back of the title that should have read the actual date 11/18/1999. I'll include the original contract which paid Campus Coach \$133,000.00 (Exhibit G ) Now that I have shown you that GE's lawyers are involved in hiding this important evidence, I hope you will give me my day in court.

Your Honor, there is nothing I could have done in the past to show what these individuals had planned for me short of receiving this title. There is no explanation for this huge mistake proving Larry Shute and the owners of Campus Coach were conspiring not only to rob this vehicle right out from under me by hiding the title documents but also Associates/Citicapital and eventually GE had to know the significance of this document. Please note there is a bar scan on the title document I received from Montana. Our information is that this bar scan keeps track whenever a title is submitted and taken from the vault.

There is a question I must ask here. How can a loan officer (Larry Shute) for a large financial institution make loans on vehicles and at the same time secretly hold onto the titles, so I could not register the vehicles? If I could not operate the buses, how could I make money to repay the loans? How is it that three institutions, Associates, CitiCapital and finally G E do not ask that question of Mr. Shute ? There were no liens on any of the 18 buses we originally financed and they were no liens till January of 2001 and the liens were secretly made in the State of Oklahoma. I'll tell you why, Your Honor, this is the dirty little secret that all of these institutions doesn't want made public. This must be some type of a new 401K plan for certain employees. These individuals are selling vehicles right out from under hard working people across this country and making it look like it's their fault. Campus



Coach was paid \$133,000.00 dollars for two buses and continued to operate, register and eventually sell as their own. If GE's lawyers didn't know about it before, they sure found out when Nicole Coghill sent me one title and it's Oklahoma Lien papers.

Why would Larry Shute deliver a check to Campus Coach for \$133,000.00, not follow up putting a lien on the vehicle and in the future not repossess this vehicle as the other buses were with new titles from states like Indiana and West Virginia. I'll tell you why, this was a set up from the beginning. Did Shute and Campus coach split the money? Is that out of the realm of possibility? Shute's place of business looks like it a candy store for those who know the ins and outs of this business.

Campus coach registered these two vehicles two months after they received the monies from Larry shute as if they were never sold. ( Exhibit K )Not only that but in this case GE's lawyers, DLA Piper, helped in their defense when I brought them into State Court. ( Exhibit M ) What would G E stockholders say if they knew these type of occurrences are happening within GE'S walls.

I didn't realize the significance at the time but Larry Shute contacted my attorney in January 2000 ( Exhibit H ), stating, " I hope Al is working hard and pays his bill, which is already late," , knowing full well that I couldn't operate or even register the buses without the titles in his possession.

This was the beginning of their plan to eliminate me. Even in the future if I actually acquired the right to depose Larry Shute, they simply would have stated the titles were already in Manti's possession. I would bet they have postal receipts to back up their statement. They started this plan to eliminate me in January of 2000, just two months after the original contract. Why else would Larry Shute send that e-mail to my attorney Vincent Pitta unless it was to create an alibi if things got ugly. No court would have believed I didn't receive the titles. They had it covered both ways. Lets not forget that Larry Shute lied before Judge Block. Shute stated in an affidavit signed May 4, 2001 (after the Oklahoma lien entry form q=were filed on January 29,2001) that I had title to the buses and he had liens on the vehicles. ( Exhibit X ) GE would do anything not to have Larry Shute be deposed anywhere.

When I did my final refinance with Associates on August 21, 2000 the papers I signed that day said that Associates was charging me \$715.00 for fees charged by Road Ready Registration. ( Exhibit T ) That was the company ( by Rachel Carrington ) that signed the Oklahoma Lien Entry forms for Associates on January 19, 2001 and then filed with Oklahoma in January 29, 2001. This means that on August 20, 2000, which was 9 months after I bought the buses, Associates and Larry Shute were planning to file Oklahoma Liens on my buses and never get me my New York titles. And they filed these Oklahoma papers after my suit before Judge Block was filed, but before Larry Shute and his lawyer, Bennett Katz, signed papers stating that I had the titles and Associates had liens on the buses.

To back up my facts look carefully at the New York, Indiana and West Virginia clean title applications ( Exhibit I ) made to receive clean titles for the buses that were taken from me. You must understand, the titles that Larry Shute sent to Road Ready Registration for the illegal liens came back from Oklahoma with a red stamp on the original titles and could not be used to sell to anyone. Look at the title I received from the girl in Montana, (Exhibit B ), you can easily see the red stamp.

Another part of this scheme is the applying for and receiving of clean titles from Indiana, West Virginia and New York is the false information submitted to the states DMV's stating I had title and registered these vehicles when that was a complete falsehood. They also stated that they had lost the original titles when they really still had them, and gave me 11 of them back from Bobbi Buck on February 21, 2006. This goes with CitiCapital stating I must have had the original titles to register these vehicles and therefore their defense if I stated I never had the titles from the beginning. There is no other explanation, this was a well thought out plan from the beginning so intricate that the attorneys had to be involved.

Upon further review of the Indiana and West Virginia documents there were different documents within the application for the titles which is very interesting. All of the clean title applications under close inspection has some claims on the forms which are just untrue. Some say the vehicles which I'm named as the original owner state they were registered by me in New York and I had title to these buses. That is not what concerns me. Under further review, which I almost missed is the schedule "A" referred to in the application. It is a shortened list and both Campus Coach buses are

omitted in the list of buses. ( Exhibit I )

Your Honor, someone clearly omitted the two buses from the schedule and for what reason. This is not some mistake but clearly these vehicles were taken off the original Schedule A list ( Exhibit I ) and not have new titles issued for future sale. The two buses were designed to stay exactly where they always were, Campus Coach. CitiCapital repossessed the other buses, but never the two at Campus Coach.

The filings in these states was designed to get clear titles. So Larry Shute and hid buddies could resell the buses I just restored for very low prices and cash under the table. All of these actions were designed to make it look like I was partially responsible for what has occurred. It is clear now from the missing title that this is just an ordinary grab for money by Larry Shute. And Patricia Kenner kept the money from the scrap yard and never paid GE even though GE had Oklahoma Liens. It was easy money right there for the taking and they took it. Larry Shute and Patricia Kenner are connected at the hip and are just plain ordinary criminals.

I must get Larry Shute and Patricia Kenner deposed now that we have all of the evidence. I have never been allowed to get a deposition of Shute because the lawyers were covering up the fraud. This new evidence cannot be defended in any manner. This whole matter does not pass the smell test.

It continues, Your Honor.

Here's another part of GE's plan we just uncovered. You mentioned Carfax in your decision and how I could have discovered facts regarding the titles on Carfax. The Oklahoma lien information didn't exist on the Carfax reports when I tried to reopen the case before your Court in 2006. GE didn't present the information to Carfax because they never wanted me to know about the Oklahoma liens. But someone has called Carfax and backdated all of the buses with the Oklahoma liens, now stated on the report. I'll submit both reports for both years. ( Exhibit J )

Your Honor, my suit before Judge block was filed with the defendants hiding evidence and still to this day continues to be hidden in GE's vault in Montana. I have been trying almost 2 years to have GE release the title they

are holding without success. Their response to my attorneys is, "What are you going to do with it."

This is the same title that Larry Shute paid Campus Coach \$133,000.00 for. Larry Shute actually signed the contract. ( Exhibit G ) It's the same title that Campus Coach filed for a clean title to sell as their own. ( Exhibit D ) Campus Coach has registered these buses every year as their own. ( Exhibit K )

When we started the case against GE, we also started a case against Campus Coach in Richmond County State Court before Judge Maltese. ( Exhibit L ) When we tried to depose Larry Shute, we were met with strong opposition by GE's attorneys, DLA Piper. ( Exhibit M ) We thought this odd. Why was GE helping Campus Coach when it appeared that one of their employees, Larry Shute, was involved in some type criminal activity with the owners of Campus Coach? Also, Campus Coach has two buses which were GE's collateral, and instead of trying to go after Campus Coach to find out why they still had the buses, they took all steps to protect their crooked employee.

Looking back now, I'm convinced that GE knew exactly what occurred and got rid of Larry Shute. No doubt, Larry Shute left signing a non disclosure agreement. This would explain why the Campus Coach's titles were hidden and why they were never properly repossessed and new titles procured and resold like all of the other buses. It also explains why Campus Coach registered these buses for years and even applied for a new title to sell as their own.

I have all this painstakingly documented. I'll even enclose the letter Patricia Kenner supplied to the NYS DMV stating she owned the vehicle and even the check she received when Campus Coach sold the bus to Nimco Industries in New Jersey. ( Exhibit N ) Did Larry Shute and Patricia Kenner split the money? How did she continue to register and sell buses she was paid for? Why was her attorney Adam Newman being helped by GE's attorney Michael Hynes corresponding between the two? I personally sent these documents to the in-house attorney for GE in Irving, Texas, Scott Tinkersley. His response is silence

The Campus Coach case was set for trial by Judge Maltese in Richmond

County, ( Exhibit O ) but his decision was reversed by the Appellate court in Brooklyn.

Your Federal Decision about the titles seemed to help them reverse Maltese's decision to move forward. I guess we know why GE was helping Campus Coach. We would have deposed Larry Shute in that trial, something GE can't have happen.

I received the decision of Judge Strong reversing Judge Cebell's decision for a full trial in the Nicole Coghill's case. ( Exhibit P ) Judge Cebell ordered a full trial where all of the people involved with these titles would be deposed. I assumed it would have been restricted and GE would have fought fiercely to stop Larry Shute from testifying or even deposed along with Patricia Kenner of Campus Coach. Testimony by either one of these individuals would clearly show the meaning behind the hiding of these two titles. We found out last week G E settled with Nicole Coghill's wrongful termination suit.

Good for her. I hope she did well to have a new beginning after G E threw her into the street, The girl should have gotten a medal not have been fired.

One can just imagine all of the people across this country who have been victimized in this title-skipping scam who didn't have the financial means to fight back and just gave up.

Your Honor, the intent of this letter is not to look for sympathy. I have watched my many years work of building a fine company be destroyed literally overnight. I have watched people I worked with closely for years, Larry Shute and Patricia Kenner become common criminals and watched my opponents lawyers make a mockery of the Federal Court system, hiding evidence and then framing their arguments in court to make me look responsible for what has happened.

Now, please, look at the latest evidence. GE is reduced to firing a \$15.00 an hour employee for releasing my title to me and its attorney is still refusing to release the second one. They fired her to try and keep me from finding her but it was too late. G E thought they could get rid of her and no one would have been the wiser. I sure would have liked to have been a fly on the wall when G E found out I contacted her. They would have made it

look like she was their worst employee and fired her for cause. We know now GE's lawyers knew about the title they sent me and the remaining title they refuse to release. The same title that Patricia Kenner of Campus Coach applied for from the NYS DMV ( Exhibit D ) and sold as her own. ( Exhibit E )

Your Honor, I ask you to reopen my case because evidence was hidden not only from me but from your Court. Evidence which clearly shows the shenanigans going on in these financial institutions and no one is taking responsibility. GE's attorneys have been in contact with my lawyers just last month and want to know why we want the other title they're holding. They also threatened my attorneys with the sanctions motion you specified if we tried to reintroduce titles before your Court again. Is that all GE can do, threaten my attorneys?

They're GE.

I didn't create this situation. GE has. I didn't sell this equipment. GE has a judgment against my corporation which I'm told is well over 3 million and growing yearly counting interest. Patricia Kenner of Campus Coach saw easy money and became a common criminal. She was paid for these vehicles. My only mistake in this whole fiasco is to have been involved with disreputable and criminal people - a financial institution called GE Capital and a bus company called Campus Coach. It is maddening to see them praised as paragons of honesty and virtue. What a load of bull!

There's even more. I will not even go into the other vehicles I was scammed out of, all of them bought for pennies on the dollar. One vehicle was obtained for \$254.00 A few months earlier, it was financed for \$54,000.00 I have all the pertaining documents. He obtained a storage loan on the vehicle that was never picked up by me. He was able to have an auction sale without my knowledge or Associates knowledge All these transactions are being made right out in the open and these institutions do business as usual. Imagine, getting a bus for \$254.00 that was financed just weeks before for \$54,000.00 Nothing was ever done about this by Associates, CitiCapital or even GE even though there was an Oklahoma lien on it. Nice to know the right people.

I have contacted many of the people who bought these buses from auction



and almost all of them said they paid money under the table for these vehicles. I was even threatened by a man in Virginia, Bobby Easter, who when he found out I was inquiring about the buses threatened to put a bullet in my head. That was after he stated, "man, you know how this works, \$5,000.00 on top of the table and 10 to 15 thousand under it. Under instructions from my attorney, Paul Hollender, I made a Police report.

Since the beginning of this matter, my attorneys and I have conducted ourselves properly in all phases. We have not lied or avoided any issues. We have dealt with all matters head on against great odds. My attorney Paul Hollender has conducted himself with class even though the opposition has tried to get sanction motions against him. I have never heard profanity come out of his mouth all these years, never.

Your Honor, I have been introduced to an attorney, Michael Bowen, of Kasowitz, Benson, Torres & Friedman, who has looked at all of the documents in this case. He has even been on conference calls with GE attorney's trying to figure out where this is going and trying to get the other title GE is holding released. He has also told me in your decision that GE will try and get our motion to reopen stopped just on technical issues about the new title and that they may be successful and his firm would face sanctions before any new evidence is heard.

I just would like you to look at this case again in it entirety with all the evidence we have now before you and not piecemeal. From the beginning, looking at Larry Shute's letter to my attorney, Vincent Pitta. Larry Shute is asking for help from my attorney stating I hope Al's working hard and wanting Pitta to remind me I'm behind on my payments. He knows I'm not operating, he has the titles in his possession.( Exhibit H ) They were laying the groundwork where either way I fought, GE would make it look like I was part of the blame. They simply would have stated they sent me the titles already and that I was merely trying to avoid paying for the equipment, even though I sent them \$149,000.00 of certified funds for buses I never received. ( Exhibit R )

Please remember that the Oklahoma lien applications information was not given to the Carfax people but was backdated for whatever reason. Someone has to actually give this information years after the actual filings and again for what reason? This was a well thought - out plan that was carried out

behind my back as well as your court. Please look at the car fax reports in 2006 when Mr. Bennett Katz mentioned carfax in his papers, but pertinent information was kept hidden to continue their cover-up.

Could all of these events have happened without the express knowledge and direction of GE's attorneys?

I have personally sent many letters to Mr. Scott Tinkersley, a lawyer for G E in their Irving , Texas office. I have given him detailed documents about Campus Coach applying for a new title with Patricia Kenners letter, the actual copy of the new title Campus Coach received from the NYS DMV, the copy of the check Campus Coach received from Nimco industries when they Campus coach my vehicle and his response was silence. I'm not talking a single letter but many letters asking for some type of response and nothing. I also sent many e-mails to a Kim Jones in the Montana vault offices asking to forward my requests to Mr. Tinkersley who refused to give his e-mail address. ( Exhibit Y )

Your Honor, in your decision you stated that we failed to prove fraud upon the Court and that we didn't show enough evidence of Bennett Katz being aware of the on-goings regarding the titles being withheld. Now we show several lawyers for G E not only knowing about the title released to me by an ex GE employee Nicole Coghill, GE continues to hold onto the other Campus Coach title with the blessings of four of their own attorney's.

It is not possible looking at these documents now with arrival of the Title from GE's Montana vault that Bennett Katz , the attorney for CitiCapital wasn't aware of these missing documents. The correspondence between the attorneys when we requested to depose Larry Shute in the Campus Coach case is further proof. Anyone just looking at the papers can tell that Campus Coach and Larry Shute has a special relationship. Why would the lawyers for G E, DLA Piper not want to get to the bottom of obvious stealing of monies from these financing contracts and actually want to depose Larry Shute themselves. G E and CitiCapital doesn't want to know.

GE's attorney Patricia O'Prey asked for a conference call between my GE and my attorneys. She was asked by my attorneys if GE had the other Campus coach title which she acknowledged. She then asked what do we want to do with it. When my attorney's stated how Campus Coach has sold

this vehicle while applying for new titles she refused to answer and she was asked four times the same question. Her only response was that we faced sanctions from Judge Feuerstein if we proceeded.

Your Honor, I was going over all of the documents I have accumulated over the years this past Sunday. In every instance there is something amiss. Releases that I supposedly signed when I started the financing of the Campus coach buses. Even though I was represented by my attorney, Vincent Pitta, who would have advised me of the release. I may have even have agreed to sign if presented to my attorney but I'm convinced now as never before foul play was at hand then.

I continue to the stalling of the bus arrivals in small groups over 9 months since I was supposed to have a full fleet by March of 2000. Instead Larry Shute billed me for each as they were slowly financed. I couldn't run the bus routes to make money until all the buses were purchased.

The hiding of the titles and the taking of my \$149,000.00 of certified funds for vehicles I never received is what ended my hopes of restarting my business. In fact, going over my original papers I specifically mention how Associates interfered with my business with delays and making me make payments on vehicles I had not received. Their response was we deny these allegations. Remember at this time and since then the title which I received from the GE's Montana vault, which got Nicole Coghill fired, and the remaining Campus Coach title is still in GE's possession, I never got possession of these buses.

It is quite obvious now looking at the missing title and the wrong date of statement attached nine months after it was supposed to have been submitted to the NYS DMV, that there is no defense to what has happened. GE's lawyers can sit in their offices till doomsday and not come up with a legitimate answer. Plan and simple, they have been caught, red handed.

Please reconsider your decision and reopen my case before your Court.

Your Honor, this is why I'm proceeding Pro Se and eliminate the posturing that will obviously come from G E's lawyer and create a smoke screen. This was a well thought out plan that could not have been carried out without the express knowledge of all the defendants lawyers. These documents I have

produced are not defensible. If you allow my case to move forward I will retain my lawyers who will aggressively go after everyone involved in this Title Skipping scam.

The reason we waited to file this claim was that we were hoping G E would settle with the girl , Nicole Coghill. My wife insisted we wait as long as possible because she felt a filing on our part would put her future at risk even more and GE would hunker down and fight her as well. I do not know if we helped her in any way but my wife always blamed me for her firing. It was my wife who insisted we try to help her when her firing became known to us.

Respectfully

Alfred J Manti

Summary of my position:

1. I'm starting this lawsuit to show how Citicapital and G E made a fool of me and made a mockery of the Federal Court system.

I have now obtained documents released to me, obviously by mistake, by a low level employee of G E which proves my original case that was dismissed by Judge Feurstein.

This employee, Nicole Coghill, was fired soon after from her position in the G E title section in Billings, Montana but has provided to me the name of GE's attorney, John VonLangen, who is hiding the second set of title documents and refuses to give them to me. In addition, three other GE lawyers, Patricia O'Prey, Michael James, and Scott Tinkersley who admit they have the other title, Vin# 1M89CM8A7BPO36640 but also refuse to release these documents.

Their excuse for not giving me the papers is that I lost the case before Judge Fuerstein. In reality, the papers that were hidden and released by accident plus the papers they are still holding from me are precisely the papers the Court needs to see to rule in my favor.

This is what I want the Court to do:

1. Grant me a judgment against Citicapital and G E for hiding evidence before you ruled on dismissing my case.
2. Grant me a judgment against Ct Lines d/b/a Campus Coach and its owner Patricia Kenner for stealing 2 buses that were never repossessed but were registered yearly after they were paid \$133,000.00 and used as their own continuously from 11/18/1999 to 8/8/2009 and kept the sale price.
3. Have Judge Feuerstein open up my old case and let me take depositions and go to trial.